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November 10, 2021

By ECF

The Honorable Jesse M. Furman
United States District Court Judge
for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

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Re: *Karine Travieso v. Major League Soccer, L.L.C. et al.*, No. 1:21-cv-06998-JMF

Dear Judge Furman:

We represent Defendants Major League Soccer, L.L.C., JoAnn Neale, and Gary Stevenson (“Defendants”) in the above-captioned action. We write jointly with Plaintiff Karine Travieso (“Plaintiff”) pursuant to Rule 1.F. of Your Honor’s Individual Rules and Practices in Civil Cases and the Notice of Initial Pretrial Conference ordered by Your Honor on August 23, 2021 (ECF 10), to respectfully request a 60-day extension from November 26, 2021 until January 25, 2022 for the parties to file a joint letter, as well as a proposed Civil Case Management Plan and Scheduling Order, and an adjournment of the initial pretrial conference from December 2, 2021 to January 31, 2022.

The parties seek the adjournment and corresponding extension to provide them with an opportunity to participate in Court-ordered mediation through the Southern District of New York’s Alternative Dispute Resolution program in advance of the conference. (ECF 17.) The parties were scheduled to participate in mediation on November 11, 2021. Late in the day on November 8, 2021, the assigned mediator informed the parties that he would be unable to go forward with the mediation due to other business. The Mediation Office is in the process of assigning a new mediator and has directed the parties to set a new mediation date by November 15. In the event the mediation is successful, the initial conference and related submissions will not be necessary.

As noted above, the parties’ next scheduled appearance is December 2, 2021, and the deadline for the pre-conference submissions is November 26. The parties have not made any previous requests to adjourn that appearance or extend that deadline. The parties make the instant request to allow them to participate in mediation and in an effort to conserve the Court’s and parties’ resources.

We thank the Court for its attention to this matter.

Proskauer»

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Respectfully submitted,

/s/ Elise M. Bloom

Elise M. Bloom

cc: All Counsel of Record via ECF

Application GRANTED. The conference scheduled for December 2, 2021, is hereby ADJOURNED to February 3, 2022, at 3:30 p.m. The parties' preconference letter is due January 27, 2022. The Clerk of Court is directed to terminate ECF No. 20. SO ORDERED.



November 12, 2021